

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN**

David McNair,  
*Plaintiff,*

Case No. 1:20-cv-63

v.

Hon. Janet T. Neff

Collin Pratt.  
*Defendant.*

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**PLAINTIFF’S RULE 26(2)(1) INITIAL DISCLOSURES**

NOW COMES Plaintiff, David McNair, by and through counsel, Altman Law, PLLC, and Solomon Radner, and hereby disclosures the following disclosures:

1. Currently Known Witnesses:

- a. Plaintiff David McNair, c/o counsel
- b. Defendant Colin Pratt, c/o counsel
- c. MDOC employees, contractors, and other witnesses, including:
  - i. Sgt Cunningham
  - ii. Sgt Wyse
  - iii. Inspector Miller
  - iv. Gregory Skipper
  - v. Heidi Washington
  - vi. Assistant Deputy Director Rapelje
  - vii. Deputy Director McKee

viii. Kathy Warner

ix. Stephen Marschke

x. Jose Herrera

xi. Lieutenant Henry

xii. Jamie Hauck

xiii. Andrew Higgins

xiv. Jacob Clark

xv. Daniel Sprague

d. Julie Wax, location unknown

e. Taylor Pratt, location unknown

f. MDOC inmate Dana Miller

g. Taylor Pratt

h. Haylie Edwards

i. Melissa *Unknown Last Name*, Defendant's mother

j. Julie Wax

k. Any and all medical treaters of Plaintiff

l. Any and all witnesses learned through the course of discovery

2. Currently known Documents

a. All pertinent grievances, medical records, and internal notes and memoranda related to this action

- b. All emails, memoranda, and other documentation created and maintained by any MDOC personnel or investigators
  - c. All documents and records related to all investigations done by MDOC, Internal Affairs, or any other governmental or non-governmental agencies into Mr. Pratt, Mr. McNair, or the claims related to this action
3. Damages Claimed:
- a. Compensatory damages for pain, suffering, humiliation, physical pain, emotional pain, psychological pain, and any other recoverable damages
  - b. Punitive damages
  - c. Attorney fees and costs
4. Insurance Agreement
- a. Plaintiff believes the MDOC and/or the State of Michigan are responsible for both representation and indemnification of Mr. Pratt.

Respectfully Submitted,

/s/ Solomon M. Radner  
Solomon M. Radner (P73653)  
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Dated: July 1, 2022

**CERTIFICATE OF SERVICE**

I hereby affirm that on this 1<sup>st</sup> day of July 2022, that the foregoing document was filed with the Court's CM/ECF electronic filing system, and that a copy of said document was served upon all parties of record, via electronic service.

/s/ Solomon M. Radner